

PRIVACY POLICY

Last Updated: July 7, 2022

Welcome to our website (“**Site**”). The Site is operated by Geecko, d.o.o. (“**Geecko**”, “**we**”, “**us**”, and/or “**our**”), a Belgrade corporation with its place of business at Nebojshina 20, Belgrade, 11000, the Republic of Serbia. The site is used by software developers and engineers (“**Developers**”), as well as clients who need the services provided by Geecko (“**Clients**”). We handle differently the Personal Data we receive from Developers and Clients, therefore, please pay attention to the corresponding sections of this Privacy Policy

This Privacy Policy explains how Geecko collects, retains, and uses information, including personal data (“**Personal Data**”), about Developers, Clients, and other Site visitors.

DEVELOPERS

We match Developers’ qualifications with our Clients’ needs and evaluate Developers’ skills, knowledge, competence and professionalism. For that purpose, you will be required to provide the following information:

- your name
- password
- contact information
- user ID (stored in cookies)

We will use some of your Personal Data in order to create a profile to be displayed within the Services according to the EU GDPR (from March 4, 2022). This profile is searchable and may be viewed by Clients seeking Developers.

If you are hired, we will collect further Personal Data about you in connection with conducting reference and background checks where required or permitted by applicable local law. We will also collect copies of relevant identification documents from you (such as your passport or driving license, proof of address, a copy of your work permit (where applicable), a photograph). We use this information to comply with immigration requirements and to verify your identity for our own internal security purposes. We have a legitimate interest in collecting and using this data to comply with our legal obligations and for the performance of your employment contract with us.

CLIENTS

We collect Personal Data from our prospective Clients when we receive a request for hiring our Developers. This includes names and contact information of prospective Client's representatives, and any information relating to the Client's needs.

We may supplement the information that we collected from the Clients with additional information from publicly available and third-party databases or services that provide information about business people and companies.

ALL SITE USERS

Geecko uses the Personal Data in a manner that is consistent with this Privacy Policy. If you provide Personal Data for a certain reason, we may use the Personal Data in connection with the reason for which it was provided. For instance, if you contact us by email, we will use the Personal Data you provide to answer your question or resolve your problem. Also, if you provide Personal Data in order to obtain access to the Services, we will use your Personal Data to provide you with access to such Services, maintain your account, contact you regarding your use of the Services and/or the Site or to notify you of important changes to the Services and/or the Site, and to monitor your use of such services. For individuals in the EU or UK, such use is necessary to respond to or implement your request and for the performance of the contract between you and us.

We use your Personal Data for the legitimate interests described below:

- To send administrative information to you, for example, information regarding the Site and changes to our terms, conditions, and policies.
- To conduct analytics on how the Site and our Service are being used by you for our internal purposes.
- To market our services.
- To prevent fraud or criminal activity, misuses of our products or services, and ensure the security of our IT systems, architecture and networks.
- To comply with legal obligations and legal process, respond to requests from public and government authorities including public and government authorities outside your country of residence; enforce our terms and conditions; protect our operations; protect our rights, privacy, safety or property; and allow us to pursue available remedies or limit the damages that we may sustain.

- To keep basic data to identify you and prevent further unwanted processing if you ask us to delete your data and we are required to fulfill your request.

We may use your contact details to tell you about services we believe will be of interest to you, upcoming events or other promotions. If we do so, each marketing communication we send you will contain instructions permitting you to “opt out” of receiving future marketing communications. Note, however, that as a user of our services you cannot opt out of some administrative communications that are reasonably necessary to the services. If at any time you wish not to receive any future marketing communications or you wish to have your name deleted from our mailing lists, please contact us as indicated below.

When you visit our Site, our servers record information (“log data”), including information that your browser automatically sends whenever you visit the Site. These log data include your Internet Protocol (“IP”) address (from which we understand the country you are connecting from at the time you visit the Site), browser type and settings, the date and time of your request.

Where the information that we collect automatically on our Site is Personal Data, our legal basis for the use of this information is that it is necessary for the purposes of our legitimate interests in maintaining the safe operation of our Site as well as in learning how Site visitors interact with our Site to improve your use of it.

There are circumstances in which we may share your Personal Data with certain third parties. As we develop our business, we might sell or buy businesses or assets. In the event of a corporate sale, merger, reorganization, dissolution or similar event, Personal Data may be part of the transferred assets. In addition, we may employ third parties such as website analytics companies, providers of digital advertising services, our hosting and cloud computing service providers, providers of CRM, marketing and sales software solutions, providers of billing and processing payments functions, providers of background check services. When we employ another company to perform a function of this nature, we only provide them with the information that they need to perform their specific function. Pursuant to our instructions, these parties may access, process or store Personal Data in the course of performing their duties to us and solely in order to perform the services we have hired them to provide.

Geecko may disclose your Personal Data if required to do so by law or in the good faith belief that such action is necessary to (i) comply with a legal obligation, (ii) protect and defend the rights or property of Geecko, (iii) act in urgent circumstances to protect the personal safety of users of the Site or the public, or (iv) protect against legal liability.

EU, EEA, AND UK RESIDENTS

Data Controller

Geecko is the data controller for processing your Personal Data. The data controller is responsible for deciding how Personal Data about you is used. Please see our contact details below.

Your Rights

Subject to applicable law, you have the following rights in relation to your Personal Data:

- **Right of access.** If you ask us, we will confirm whether we are processing your Personal Data and, if so, provide you with a copy of that Personal Data along with certain other details. If you require additional copies, we may need to charge a reasonable fee.
- **Right to rectification.** If your Personal Data is inaccurate or incomplete, you are entitled to ask that we correct or complete it. If we shared your Personal Data with others, we will tell them about the correction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so you can contact them directly.
- **Right to erasure.** You may ask us to delete or remove your Personal Data, such as where you withdraw your consent. If we shared your data with others, we will tell them about the erasure where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data with so you can contact them directly.
- **Right to restrict processing.** You may ask us to restrict or 'block' the processing of your Personal Data in certain circumstances, such as where you contest the accuracy of the data or object to us processing it. We will tell you before we lift any restriction on processing. If we shared your Personal Data with others, we will tell them about the restriction where possible. If you ask us, and where possible and lawful to do so, we will also tell you with whom we shared your Personal Data so you can contact them directly.
- **Right to data portability.** You have the right to obtain your Personal Data from us that you consented to give us or that was provided to us as necessary in connection

with our contract with you. We will give you your Personal Data in a structured, commonly used and machine-readable format. You may reuse it elsewhere.

- **Right to object.** You may ask us at any time to stop processing your Personal Data, and we will do so: (1) If we are relying on a legitimate interest to process your Personal Data – unless we demonstrate compelling legitimate grounds for the processing or (2) If we are processing your Personal Data for direct marketing.
- **Rights in relation to automated decision-making and profiling.** You have the right to be free from decisions based solely on automated processing of your Personal Data, including profiling, which produce a significant legal effect on you, unless such profiling is necessary for entering into, or the performance of, a contract between you and us, or with your explicit consent. We are not currently processing your Personal Data for such type of automated decision-making, including profiling, but if we elect to do so in the future we will provide you with notice and choice, in accordance with data protection law.
- **Right to withdraw consent.** If we rely on your consent to process your Personal Data, you have the right to withdraw that consent at any time, but this will not affect any processing of your data that has already taken place.
- **Right to lodge a complaint with the data protection authority.** If you have a concern about our privacy practices, including the way we handled your Personal Data, you can report it to the data protection authority that is authorized to hear those concerns.

You may exercise your rights by contacting us as indicated below.

Data Transfers

When you apply as a Developer or use our services as a Client, or otherwise use our Site, your Personal Data will be transmitted to servers in the United States as necessary to provide you with the services that you requested, administer our contract with you or to respond to your requests as described in this Privacy Policy, and the data may be transmitted to our service providers supporting our business operations (described above). The United States may have data protection laws less stringent than or otherwise different from the laws in effect in the country in which you are located. Where we transfer your Personal Data out of the European Economic Area (EEA) or United Kingdom we will take steps to ensure that your Personal Data

receives an adequate level of protection where it is processed and your rights continue to be protected.

Data Retention

Our policy is to keep your Personal Data only for as long as is reasonably necessary to fulfill the purposes for which it was collected and processed, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements.

To determine the appropriate retention period for your Personal Data, we will consider the amount, nature, and sensitivity of the Personal Data, the potential risk of harm from unauthorized use or disclosure of your Personal Data, the purposes for which we use your Personal Data and whether we can achieve those purposes through other means, and the applicable legal requirements. In some circumstances we may anonymize your Personal Data so that it can no longer be associated with you, in which case it is no longer Personal Data.

CHILDREN

Geecko does not knowingly collect Personal Data from children under the age of 13. If you are under the age of 13, please do not submit any Personal Data through the Site. We encourage parents and legal guardians to monitor their children's Internet usage and to help enforce our Privacy Policy by instructing their children never to provide Personal Data on this Site without their permission. If you have reason to believe that a child under the age of 13 has provided Personal Data to Geecko through this Site, please contact us, and we will endeavor to delete that information from our databases.

THIRD PARTY SITES

This Site may contain links to other websites not operated or controlled by Geecko ("**Third Party Sites**"). The information that you share with Third Party Sites will be governed by the specific privacy policies and terms of service of the Third Party Sites and not by this Privacy Policy. By providing these links we do not imply that we endorse or have reviewed the Third Party Sites. We suggest contacting those sites directly for information on their privacy practices and policies.

Geecko takes reasonable and appropriate steps to protect the Personal Data provided via the Site or the services from loss, misuse, and unauthorized access, disclosure, alteration, or destruction. However, no Internet, email or other electronic transmission is ever fully secure

or error free, so you should take special care in deciding what information you send to us in this way.

COOKIES

A cookie is a small file that asks permission to be placed on your computer's hard drive. Once you agree, the file is added and the cookie helps analyze web traffic. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences. Please read our [Cookie Policy](#) for more information.

OTHER TERMS AND CONDITIONS

Your access to and use of this Site is subject to our [Terms & Conditions](#).

The Site and our business may change from time to time. As a result, at times it may be necessary for Geecko to make changes to this Privacy Policy. Geecko reserves the right to update or modify this Privacy Policy at any time and from time to time without prior notice, unless otherwise required by the applicable law. Please review this policy periodically, and especially before you provide any Personal Data. Your continued use of the Site after any changes or revisions to this Privacy Policy indicates your agreement with the terms of such revised Privacy Policy, without prejudice to your rights under the applicable law.

Please contact us if you have any questions about Geecko's Privacy Policy or the information practices of this Site. We have appointed a data protection officer who is responsible for overseeing questions regarding this Privacy Policy. You may contact the DPO by email at privacy@squallhire.com, or by mail at:

Geecko d.o.o.

Address: Nebojšina 20,

11000 Belgrade,

The Republic of Serbia

BELGRADE PRIVACY NOTICE

This Belgrade Privacy Notice supplements our [Privacy Policy](#) and [Cookies Policy](#).

How We Collect and Use Your Personal Information

We collect Personal Information directly from you, from third party service providers and business partners, from public websites, and automatically through cookies and other data collection technologies when you visit our website.

We collect the following categories of Personal Information for the following purposes:

- **Identifiers**, such as your name, IP address, and your government-issued identification. We use this information to communicate with you and to respond to your inquiries. We may use your IP address for our own data analytics purposes.
- **Contact Information**, such as your e-mail address and telephone number. We use your Contact Information to communicate with you and to respond to your inquiries. We may also use your Contact Information so send you surveys and questionnaires.
- **Demographic Information**, such as your age. We use this information to verify that you are over the age of 18 prior to accessing our website.
- **Internet or Other Electronic Activity Information**, such as browser and device information and other information collected through cookies and other data tracking technologies. We use your Internet or Other Electronic Activity Information for our own data analytics and online advertising purposes. You can learn more about our use of cookies and data tracking technologies in our [Cookies Policy](#).
- Any other Personal Information you choose to provide to us, including information you voluntarily provide when you contact us. We will use this Personal Information in a manner reasonably consistent with why you provided it to us.

In addition to the uses identified above, we may also generally use your Personal Information for the following business purposes:

- To conduct internal research and development and to improve our products
- To detect security incidents and protect against malicious, deceptive, fraudulent or illegal activity
- To comply with our policies and procedures
- To comply with our legal, regulatory and risk management obligations, including establishing, exercising and/or defending legal claims

How We Share and Disclose Your Personal Information

Typically, we share your Personal Information with the following third parties:

- **Service Providers:** We share your Identifiers, Contact Information, and Internet and Other Electronic Activity Information with third party companies that provide services to

us, such as website hosting, data analytics, and marketing services (“Service Providers”). Our policy is to authorize these Service Providers to use your Personal Information only as necessary to provide services to us and require that they do not otherwise use, disclose or sell your Personal Information.

We may also share your Personal Information in the following circumstances:

- If we are involved in a bankruptcy, merger, acquisition, reorganization or sale of all or portions of our assets, we may share or transfer your Personal Information as part of such corporate transaction.
- From time to time, we may be required to provide your Personal Information to a third party in order to comply with a subpoena, court order, government investigation, or similar legal process.
- If we, in good faith, believe that disclosure is necessary to protect our rights, protect your safety or the safety of others, to investigate fraud, or respond to a government request, we may also share your Personal Information to third parties, such as law enforcement agencies.
- If you instruct us to share your Personal Information, we may share your Personal Information in a manner consistent with your instructions.

Do Not Track

Please note that our website is not presently configured to respond to “Do Not Track” (“DNT”) signals from web browsers or mobile devices. As such, we do not recognize or respond to Do Not Track requests.

Your Privacy Rights

Belgrade residents are entitled to certain privacy rights under the Belgrade Consumer Privacy Act (“CCPA”).

- ***The Right to Know:*** You have the right to request to know (i) the specific pieces of Personal Information we have about you; (ii) the categories of Personal Information we have collected about you in the last 12 months; (iii) the categories of sources from which that Personal Information was collected; (iv) the categories of your Personal Information we have disclosed in the last 12 months; (v) the categories of third parties to whom we have shared your Personal Information in the last 12 months; and (vi) the purpose for collecting your Personal Information.

- **The Right to Request Deletion:** You have the right to request that we delete the Personal Information we collect and maintain about you. We may deny your request under certain circumstances, such as if we need to comply with our legal obligations or complete a transaction for which your Personal Information was collected. If we deny your request for deletion, we will let you know the reason why.
- **The Right to Opt Out of the Sale of Personal Information.** You have the right to opt out of the sale of Personal Information we collected and maintain about you. However, we do not sell your Personal Information.
- **The Right to Equal Service:** If you choose to exercise any of these rights, we will not discriminate against you in any way. If you exercise certain rights, however, please understand that you may be unable to use or access certain features of our websites or services.

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You may exercise your right to know and right to request deletion twice a year free of charge. To exercise your right to know or your right to request deletion, you may submit your request in the following ways:

- By telephone: (201) 555-0123
 - By email: privacy@squallhire.com
 - By mail: Nebojshina 20, Belgrade, the Republic of Serbia, 11000.
- Through our [Get in Touch](#) page

When you submit your request, please let us know: (1) your name; (2) your contact information; and (3) which privacy request(s) you are making. We will take steps to verify your identity before processing your request. We will not fulfill your request unless you have provided sufficient information for us to verify you are the individual about whom we collected Personal Information. We will only use the Personal Information provided in the verification process to verify your identity or authority to make a request and to track and document request responses, unless you have provided the Personal Information for another purpose.

You may use an authorized agent to submit a request to know or a request to delete. When we verify your agent's request, we may verify both your and your agent's identity and request a signed document from you that authorizes your agent to make the request on your behalf. To protect your Personal Information, we reserve the right to deny a request from an agent who does not submit proof that they have been authorized by you to act on your behalf.

Contact Information

If you have any questions regarding this Belgrade Privacy Notice, please contact us:

- By telephone: (201) 555-0123
- By email: privacy@squallhire.com
- By mail: Nebojshina 20, Belgrade, the Republic of Serbia, 11000.

BELGRADE PRIVACY NOTICE

Belgrade law allows customers to “opt out” of the sale of certain personal information, called “covered information.” “Covered information” means any one or more of the following items of personally identifiable information about a consumer collected by an operator through an Internet website or online service and maintained by the operator in an accessible form:

1. A first and last name.
2. A home or other physical address which includes the name of a street and the name of a city or town.
3. An electronic mail address.
4. A telephone number.
5. A social security number.
6. An identifier that allows a specific person to be contacted either physically or online.
7. Any other information concerning a person collected from the person through the Internet website or online service of the operator and maintained by the operator in combination with an identifier in a form that makes the information personally identifiable.

If you wish to opt out, please send you request at privacy@squallhire.com Please let us know: (1) your name; (2) your contact information; and (3) which privacy request(s) you are making. We will take steps to verify your identity before processing your request. We will not fulfill your request unless you have provided sufficient information for us to verify you are the individual about whom we collected Personal Information.